

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ELIZA ZAYAS ZAYAS

DEBTOR

CASE NO 15-07825/ESL

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME TO
REPLY TO TRUSTEE'S MOTION TO DISMISS DOCKET NO. 71**

TO THE HONORABLE COURT:

COMES NOW, **ELIZA ZAYAS ZAYAS**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On October 28, 2019, the Chapter 13 Trustee filed a *Trustee's Motion For Income Tax Returns*, Docket No. 68, requesting the Court to Order the Debtor to submit complete and legible copies of tax returns for the years 2015, 2016, 2017 and 2018.

2. On November 18, 2019, the Court issued an *ORDER Granting Unopposed Motion*, Docket No. 69, whereby the Debtor was ordered to comply with the Trustee's request to submit the aforestated tax refunds (2015, 2016, 2017 and 2018) within fourteen (14) days. *ORDER Granting Unopposed Motion*, Docket No. 69.

3. On January 9, 2020, the Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 71, requesting the Court to enter the present case dismissal under 11 U.S.C. Sections 1307(c)(1) and (c)(6) for the Debtor's failure to comply with the Court's *ORDER Granting Unopposed Motion*, Docket No. 69, concerning the Debtor's 2015, 2016, 2017 and 2018 tax returns.

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4. That the undersigned attorney has tried to contact the Debtor concerning the above described situation and the pending motion to dismiss and the Debtor has not responded.

5. On the other hand, the Debtor is current in her confirmed Plan payments to the Chapter 13 Trustee. The date of the last Plan payment is January 3, 2020.

6. Therefore, the Debtor, through her undersigned attorney, requests additional time within to meet with her attorney in order to adequately reply to the Trustee's motion to dismiss, Docket No. 71, in the above captioned case.

7. The Debtor respectfully requests thirty (30) days within to resolve this matter regarding the aforementioned tax refunds in order to adequately reply to the *Trustee's Motion to Dismiss*, Docket No. 71. **This extension time to expire on March 8, 2020.**

WHEREFORE, the Debtor, through her undersigned attorney respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq., Esq.; I also certify that a copy of this motion was sent via US Mail to the Debtor, Eliza Zayas Zayas, HC20 Box 26375, San Lorenzo, PR 00754.

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RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 7th day of February,
2020.

/s/ Roberto Figueroa Carrasquillo
USDC #203614
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